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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JACK ZOLOWICZ, et al.,

Plaintiff,

vs.

CITY OF OAKLAND, et al.,

Defendants.

) Case No.: C06-05915 MJJ

)  
 ) **STIPULATION AND [PROPOSED]**  
 ) **ORDER EXTENDING TIME FOR**  
 ) **EXPERT DISCLOSURE, RULE 26**  
 ) **REPORTS AND COMPLETION OF**  
 ) **EXPERT DISCOVERY**

WHEREAS, the parties have recently complete<sup>ed</sup> a large number of depositions which will need to be reviewed by the parties respective experts;

WHEREAS, the Honorable Maria Elena James is currently reviewing a number of confidential police department documents *in camera* which, if ordered compelled, will need to be reviewed and considered by the parties' respective police practices experts;

WHEREAS, the parties have recently stipulated that they may disclose three expert witnesses instead of two;

1 WHEREAS, the parties are contemplating additional fact witness depositions which may  
2 also need to be provided to their liability and/or damage experts; and

3 WHEREAS, the parties need additional time for their expert witnesses to complete their  
4 respective Rule 26 reports in light of the foregoing,

5 WHEREAS, the parties have agreed to attend a further mediation session before Scott  
6 Emblidge on September 18, 2007, and wish to avoid incurring substantial expert witness costs  
7 which may hinder settlement discussions as said further mediation session,

8 THE PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD, DO HEREBY  
9 STIPULATE AND AGREE THAT:


10 The deadline for disclosure of the identities of expert witnesses shall be extended to  
11 September 25, 2007;

12 The deadline for disclosure of expert witness Rule 26 reports shall be extended to  
13 October 10, 2007; and,


14 The deadline for completion of expert discovery and depositions shall be extended to  
15 October 31, 2007.

16 **However dispositive miton date nor trial dates will be continued. MMJ**  
17 **IT IS SO STIPULATED AND AGREED:**


18 Dated: August 29, 2007

  
JAMES B. CHANIN  
Attorney for Plaintiffs

19 Dated: August 29, 2007

  
JENNIFER N. LOGUE  
Attorney for City of Oakland  
Defendants

20 Dated: August 29, 2007

  
GEOFFREY A. BEATY  
Attorney for Defendant  
Javier Roca

1  
2 PURSUANT TO STIPULATION,  
3 IT IS HEREBY ORDERED:

4 Dated: Sept 1, 2007

